

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YOEL WEISSHAUS,

Plaintiff

vs.

THE PORT AUTHORITY OF NEW YORK AND NEW
JERSEY,

Defendant.

Case: 11-cv-6616-RKE

AMENDED DEPOSITION DEMANDS

TO: Defendant THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY,

(collectively as “Defendant”) and Counsel:

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure and in compliance with Rule 26(g)(1) and Rule 30, you are hereby notified that the undersigned will take the deposition of the Port Authority of New York at 8:30 a.m. on 13 of October 2020. The deposition will be conducted remotely before a court reporter, by Pirozzi & Hillman, Inc., utilizing <https://reporter.vtestify.com/>. As such you are required to provide to the undersigned, by no later than October 12, 2020 at 10:00 a.m. and by email, the names of your designee and email addresses necessary for the participation in discovery.

This deposition is for discovery and for use at hearings and at trial. The foregoing subjects without limitation will be covered:

1. The operation of the Port Authority of New York and New Jersey from 2000 to the present.
2. Examining the facts regarding the subject matter of this case.
3. The rules and policies of the Port Authority of New York and New Jersey that is used in the course of its business to manage finances from 2007 to the present.

4. All documents and communications used by the Port Authority of New York and New Jersey in the course of business to manage finances from 2007 to the present.

5. The facts relating to configuring and setting the *Amount* of the toll rates adopted on August 19, 2011.

6. The contracts that the Port Authority has entered with E-ZPass to collect tolls. The relevant contracts are all those that were and are active from January 2000 to the present.

7. The payments arrangements between the Port Authority and E-ZPass since January 2000 to the present, involving revenues of the collection of tolls.

8. The capital projects from 2007 to the present such as raising the Bayonne Bridge, building the New Goethals Bridge, rebuilding the Pulaski Skyway, etc.

9. What methods of accounting the Port Authority of New York and New Jersey employs to account for ITN expenses and revenues apart from non-ITN expenses from 2007 to the present.

10. The management of budgets and financial statements properly for the Interstate Transportation Network ITN expenses from 2007 to the present.

11. The successful management of revenues to show no deficit from 2007 to the present.

12. What method the Port Authority of New York and New Jersey uses to calculate to proclaim a deficit for the ITN.

TIME RESERVED is seven (7) hours per designee and will be continued until its successful conclusion.

GOVERN YOURSELVES ACCORDINGLY.

Dated: New Milford, NJ
September 19, 2020

A handwritten signature in black ink, appearing to read 'Yoel Weisshaus', written over a horizontal line.

/s/ Yoel Weisshaus, plaintiff

Yoel Weisshaus

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